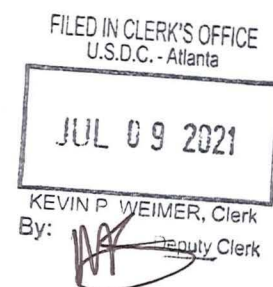


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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION



AFEEZ ADENIRAN

v.

HOLLY PIERSON

Criminal indictment No.

1:20-CR-114

MOTION TO DISMISS AND REPLACE COURT APPOINTED COUNSEL

COMES NOW the defendant, pro se, pursuant to Rule 44(a), Federal Rules of Criminal procedure and Sixth Amendment right to effective assistance of counsel respectfully moves this Honorable court, in a timely manner, to dismiss and replace court appointed Counsel HOLLY PIERSON from the above styled case for (a) Conflict of Interest, (b) Ineffective Assistance of Counsel, and (c) Irreconcilable Conflict.

Defendant herein states the following, for good cause

1. Request is being made to substitute counsel because my attorney has failed to communicate properly and professionally with me in these proceedings. In fact, there has been a complete breakdown in communication between me and my lawyer warranting a change in counsel. See United States v. Young, 482 F.2d 993, 995 (5<sup>th</sup> Cir 1973) (district court errs by not inquiring further into defendant allegation).
2. Regardless of whether my guilt is established by the excludable evidence, the proper question is whether the outcome of the proceedings would have been excluded. See Jones v. United States, 224 F. 3d 1251, 1259(11<sup>th</sup> Cir. 2000).
3. Failed to review discovery or otherwise adequately prepare for trial & was unable to meaningfully confront the government's evidence or to understand & present defense evidence.
4. Counsel's pre-trial performance has been substantially inadequate and deficient.
  - (a) The limited interactions have resulted in Ms. PIERSON not conveying an appropriate mastery of the facts and law pertinent to my case, and
  - (b) There is a fundamental breakdown in the communication which could lead to unjust disposition of this case.

WHEREFORE, the defendant prays that this Honorable Court appointed Counsel HOLLY PIERSON and any other relief this Court deems just and proper.

ON this 2<sup>nd</sup> day of July, 2021.

Respectfully Submitted,



Signature

AFEEZ ADENIRAN

Print

CERTIFICATE OF SERVICE

I, AFEEZ ADENIRAN, hereby certify that I have this day filed the foregoing MOTION TO DISMISS AND REPLACE COURT APPOINTED COUNSEL with the Clerk of Court using the Inmate Depository via United States Postal Service at Robert A. Dayton Detention Facility and will send notification of such filings to all parties to this matter.

This 2<sup>nd</sup> day of July 2021.



SIGNATURE

AFEEZ ADENIRAN

PRINT

USMS NO. 17141579

DEFENDANT